

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

May 28, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, *et al.*
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Chen:

This office represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case.

Plaintiff served subpoenas on non-parties Eugene Liddie, Christian Hogarth, Fari Gutierrez, Sara Gonzlaez, Lizbeth Medina, and Marc Purficati to produce documents prior to the May 29, 2024 hearing. Each of them failed to produce any documents.

Pursuant to Rule 45(g), the court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

After tomorrow's hearing, Plaintiff intends on filing a motion for contempt against each of them and Plaintiff reserves its right to seek leave to recall them to testify concerning the documents that should have been produced prior to the May 29, 2024 hearing.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record